

**EXHIBIT 3**

FOR THE DISTRICT OF MARYLAND

**IN THE UNITED STATES DISTRICT COURT**

XEROX CORPORATION

Plantlife

VS. : CIVIL ACTION NO. .

PHOENIX COLOR CORPORATION

TECHNIGRAPHIX, INCORPORATED

## Defendants

Deposition of ARMANDO GARCIA, III, taken

and are used as it is a good technique.

Highly developed navigation systems, such as GPS, have greatly simplified the task of finding one's way around.

Russo, Notary Public.

Sonnie L. Russo

Exported by:



Patent No. 4,110,831-A  
Date of Issue: May 16, 1978

## Baltimore, Maryland

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**COPY**

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STATE OF MARYLAND  
I, BONNIE RUSSO, a Notary Public of the  
State of Maryland, do hereby certify that the  
witness named, ARMANDO GARCIA, III, personally  
appeared before me at the time and place herein  
set out, and after having been duly sworn by me,  
was interrogated by counsel. I further certify  
that the examination was recorded  
steno graphically by me and this transcript is a  
true record of the proceedings.  
I further certify that I am not of counsel  
to any of the parties, nor an employee or  
counsel, nor related to any of the parties, nor  
in any way interested in the outcome of this  
action.  
As witness my hand and notarial seal this  
17th day of March, 2003.  
My commission expires:  
August 25, 2004  
Notary Public.

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their existing gear.

refinancing for them at their request on some of

but I do remember that. And we did some

their monthly outlay. I am not exactly sure why,

discussion about them being uncomfortable with

A. I remember later there being a

Payment?

discussion about a need to lower the monthly

Q. Do you recall whether there was any

this circumstance.

to me. I don't recall anything very unique about

there is a unique situation that they would come

The reps know their abilities and it's only if

them, I can recall had a lot to do with pricing.

of the discussions, at least not very many of

A. I don't believe so. I don't think any

that went beyond your empowerment level?

did they ever ask for any sort of special pricing

Q. In your interaction with Phoenix color

recall.

A. I don't believe so. Not that -- I don't

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A. As the vice president of operations for employee of Phoenix Color. A. As the vice president of operations for employee of Phoenix Color. He was the person from Phoenix  
Color who was integrating Technigraphix into Phoenix Color. And that you said vice president of Phoenix Color. Q. And that you said vice president of Phoenix Color? What?

Q. Did you have an understanding as to whether Donnie was an employee of Phoenix Colors? A. I never believed him to be anything else. That's the way he presented himself.

Q. How did he present himself as an else. Q.

Q. Anyone else at Hagerstown that you met  
remember. A. up with  
Q. Do you remember Donnie saying anything?  
A. I don't remember if Ed was in town that  
day or not.

Donnie is the only other person I can

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would assume since the only places I remember

A. I don't recall if it was that meeting. I

Hagerstown?

the card while he was at that meeting in

Q. Do you recall whether he had handed you  
done things like that before.

Phoenix Color for years and that I guess he had  
conversations were always that he had been with

color, no. But he did hand me a card and the  
recall him saying I am vice president of Phoenix

wouldn't even ask the question. But I don't  
card and said they are vice president I probably

assume he said it. If someone handed me their

A. I don't recall if he said it. I would

president of Phoenix Color?

Q. Do you ever recall him saying I am vice

operations.

said vice president of something. I think it was  
remember that part. I know I had a card that

like that. I don't really recall. I don't

A. I think it was operations or something